

**REMARKS**

Claims 1-8 are pending in the above-identified application, and were rejected. With this Amendment, claims 1, 4 and 5 were amended. Accordingly, claims 1-8 remain at issue in the above-identified application.

**I. 35 U.S.C. § 102 Anticipation Rejection of Claims**

Claims 1 and 4-5 were rejected under 35 U.S.C. § 102(e) as being unpatentable over Tanaka (U.S. Patent No. 6,519,360). Applicants respectfully traverse this rejection.

Claim 1, as amended, is directed to an information providing apparatus comprising storage means for storing information, relevant information which is relevant to the information, and features of the information for each category of the information, acquiring means for acquiring information to be searched for, determining means for determining a category to which the information acquired by the acquiring means belongs, extracting means for extracting features of the information acquired by the acquiring means, comparing means for using the category to compare the features of the information with the features extracted by the extracting means, the former features being stored in the storage means, and searching means for searching for the target relevant information stored in the storage means based on the result of the comparison performed by the comparing means.

Tanaka is directed to an image processing apparatus for comparing images based on color feature information. As the Examiner identified, the colors constituting the image data in Tanaka are sorted to a plurality of color groups based on predetermined color elements. See col. 2, lines 14. Contrary to claim 1, the category in Tanaka is not used to compare the features of the information. Rather, the color groups are used to classify the colors constituting the image data.

See col. 2, lines 24-26. Thus, contrary to the Examiner's statement, Tanaka does not disclose or suggest using the category to compare the features of the information with the features extracted by the extracting means. Accordingly, Applicants respectfully submit that claim 1 is allowable over Tanaka. For reasons similar to those discussed with respect to claim 1, Applicants respectfully submit that claims 4 and 5 are also allowable over Tanaka. Applicants thus respectfully request withdrawal of this rejection.

**II. 35 U.S.C. § 103 Obviousness Rejection of Claims**

Claim 2 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka (U.S. Patent No. 6,519,360) in view of Legh-Smith et al. (U.S. Patent No. 6,178,419). Applicants respectfully traverse this rejection.

As discussed above, claim 1 includes a limitation, namely using the category to compare the features of the information with the features extracted by the extracting means, that is neither disclosed nor suggested by Tanaka. Thus, it would not have been obvious to one of ordinary skill in the art at the time the invention was made to use a hierarchical structure for the category in the system of Tanaka to derive claim 2. Accordingly, Applicants respectfully request withdrawal of this rejection.

Claims 3 and 6-8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka (U.S. Patent No. 6,519,360) in view of Sugahara et al. (U.S. Patent No. 6,636,617). Applicants respectfully traverse this rejection.

As discussed above, claim 1 includes a limitation, namely using the category to compare the features of the information with the features extracted by the extracting means, that is neither disclosed nor suggested by Tanaka. Thus, it would not have been obvious to one of ordinary

skill in the art at the time the invention was made to insert a digital watermark in the information in the system of Tanaka to derive claim 3. Accordingly, Applicants respectfully request withdrawal of this rejection.

Claim 6 is directed to an information providing apparatus comprising acquiring means for acquiring information to be stored, determining means for determining a category to which the information acquired by the acquiring means belongs, inserting means for inserting a digital watermark in the information acquired by the acquiring means, storage means for storing the information in which the digital watermark is inserted by the inserting means, and delivery means for delivering the information stored in the storage means via a network. The digital watermark corresponds to the category determined by the determining means.


Applicants agree with the Examiner that Tanaka does not disclose inserting means for inserting a digital watermark in the information acquired by the acquiring means, where the digital watermark corresponds to the category determined by the determining means. However, Applicants respectfully submit that because the color groups in Tanaka are used to classify the colors constituting the image data, it would not be obvious to one of ordinary skill in the art at the time the invention was made to insert a digital watermark corresponding to the category in the information, as suggested by the Examiner. Neither Tanaka nor Sugahara suggests any motivation for, or the desirability of, the changes proposed by the Examiner. Thus, Applicants respectfully submit that claim 6 is allowable over Tanaka in view of Sugahara. For reasons similar to those discussed with respect to claim 6, Applicants respectfully submit that claims 7 and 8 are also allowable over Tanaka in view of Sugahara. Accordingly, Applicants respectfully request withdrawal of this rejection.

**III. Conclusion**

In view of the above amendments and remarks, Applicants submit that all claims are clearly allowable over the cited prior art, and respectfully request early and favorable notification to that effect.

Respectfully submitted,

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